

August 20, 2020

BY ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

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Re: Defendants' Intent to File Motions to Dismiss in:

- *City of Providence, Rhode Island v. AbbVie Inc. et al.*, No. 1:20-cv-05538 (LJL);
- *J M Smith Corporation v. Forest Laboratories, Inc. et al.*, No. 1:20-cv-05735 (LJL);
- *Teamsters Local 237 Welfare Fund et al. v. AbbVie Inc. et al.*, No. 1:20-cv-05813 (LJL);
- *Mayor and City Council of Baltimore v. AbbVie Inc. et al.*, No. 1:20-cv-05826 (LJL);
- *UFCW Local 1500 Welfare Fund v. AbbVie Inc. et al.*, No. 1:20-cv-05837 (LJL);
- *Law Enforcement Health Benefits, Inc. v. AbbVie Inc. et al.*, No. 1:20-cv-05901 (LJL)

Dear Judge Liman:

Pursuant to this Court's August 17, 2020 Order, this letter confirms that all Defendants in the above-captioned litigations intend to file timely motions to dismiss and any other appropriate preliminary motions in response to the existing complaints or any consolidated complaints.¹

Respectfully submitted,



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cc: All Counsel of Record (by ECF)

¹ See *J M Smith Corp. v. Forest Labs. Inc.*, No. 1:20-cv-05735 (LJL), ECF No. 38 (Letter Consent Motion ("LCM") to extend the time for responsive pleadings); see also LCM, *City of Providence, R.I. v. AbbVie Inc.*, No. 1:20-cv-05538 (LJL), ECF No. 15; LCM, *Teamsters Local 237 Welfare Fund et al. v. AbbVie Inc.*, No. 1:20-cv-05813 (LJL), ECF No. 14 (filed in five cases); LCM, *Teamsters Local No. 1150 Prescription Drug Benefit Plan v. AbbVie Inc.*, No. 1:20-cv-06223 (LJL), ECF No. 10.